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**VIA ECF**

Hon. P. Kevin Castel  
United States District Judge  
500 Pearl St.  
New York, New York 10007

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Re: Ex parte Application of Klein,  
20 Misc. 203 (PKC) (S.D.N.Y.)

Dear Judge Castel,

We represent intervenors Gertrudes Benedek, Alexandre R. Benedek, Vivian Noemy Benedek Moas and Evelyn Benedek. No conferences before the Court are presently scheduled.

I write on behalf of all parties to submit for the Court's consideration the enclosed proposed protective order to govern the use and handling of confidential information produced by witnesses in response to subpoenas authorized by the Court's October 26, 2022 order. The language Individual Practice No. 4 requires for all confidentiality orders appears in paragraph 7(e) of the proposed order, on pages 7–8.

Respectfully submitted,

*/s/ Luc W. M. Mitchell*  
Luc W. M. Mitchell